

September 14, 2019

Re: Request for Extension of Comment Period on EPA Pesticide Experimental Use Permit

To Whom It May Concern:

The undersigned organization requests an extension of the public comment period, for an additional 90 days, on the Environmental Protection Agency (EPA) application from Oxitec, Ltd. requesting an experimental use permit (EUP) for the OX5034 *Aedes aegypti* mosquitoes expressing tetracycline Trans-Activator Variant (tTAV-OX5034) protein (identified by number 93167-EUP-E), in the states of Florida and Texas.

We believe additional time to analyze and comment is warranted for several important reasons:

1. New research has been published this week on the efficacy of a release of Oxitec's genetically engineered mosquitoes on mosquito populations in Brazil. The study, published by Yale University scientists in the journal Nature, documented unexpected and unintended consequences from the release. Not only did mosquito population numbers bounce back up in the months following the test, but some of the native mosquitoes retained genes from the engineered mosquitoes. <https://www.nature.com/articles/s41598-019-49660-6>
2. The granting of this experimental permit has the potential, over time, to impact ecosystems across the country and those of neighboring countries. The extremely broad implications of this proposed release warrant an extension of the comment period.
3. The 30-day comment period is simply not enough time to evaluate the complexity and impacts of this proposal.
4. Extending the comment period is warranted due to the numerous legal, scientific and economic considerations contained within this proposal including potential allergenicity or other unintended effects on public health.
5. We also believe the public should be permitted the opportunity to thoroughly review and comment upon this proposal. A 30 day period is not enough time for the public to do so.

We therefore request that the comment period be extended by 90 days until January. 11, 2020.

Sincerely,

GMO Free USA